Dennis J. Nolan, Esq. Luma al-Shabib, Esq. Beth D. Simon, Esq. ANDERSON KILL P.C. 1251 Avenue of the Americas New York, New York 10020 (212) 278-1000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION.

Plaintiff-Applicant,

BERNARD L. MADOFF INVESTMENT

SECURITIES LLC.

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Defendants.

In re BERNARD L. MADOFF INVESTMENT

SECURITIES LLC,

Debtor.

IRVING L. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment

Securities LLC,

Plaintiff.

Defendants.

ALPHA PRIME FUND LIMITED, and

SENATOR FUND SPC,

12 MC 00115 (JSR)

Case No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

PERTAINS TO THE FOLLOWING

CASES:

11-CV-06524 (JSR)

11-CV-06541 (JSR)

11-CV-06677 (JSR)

12-CV-2162 (JSR)

12-CV-2239 (JSR)

12-CV-2431 (JSR)

12-CV-3401 (JSR)

ORDER GRANTING APPLICATION OF ANDERSON KILL P.C. TO WITHDRAW AS COUNSEL TO DEFENDANTS ALPHA PRIME FUND, LTD. AND SENATOR FUND SPC.

Upon the application (the "<u>Application</u>") of Anderson Kill P.C. ("<u>AK</u>"), counsel to Defendants Alpha Prime Fund, Ltd. and Senator Fund SpC for entry of an order authorizing AK to withdraw as counsel; and due and proper notice of the Application having been given; and it appearing that no other or further notice is required; and upon consideration of the Application and all pleadings related thereto; and no objection to the Application having been made, and sufficient cause having been shown therefore; it is hereby:

ORDERED that the Application is GRANTED.

Dated: New York, New York October <u>5</u>, 2013

Honorable Jed S. Rakoff

Dennis J. Nolan, Esq. Luma al-Shabib, Esq. Beth D. Simon, Esq. ANDERSON KILL P.C. 1251 Avenue of the Americas New York, New York 10020 (212) 278-1000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

12-MC-00115 (JSR)

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Case No. 08-1789 (BRL)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC.

SIPA LIQUIDATION

Defendants.

(Substantively Consolidated)

In re BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Debtor.

IRVING L. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

PERTAINS TO THE FOLLOWING CASES:

Plaintiff,

11-CV-06524 (JSR)

i idiiii,

11-CV-06541 (JSR) 11-CV-06677 (JSR)

12-CV-2162 (JSR)

ALPHA PRIME FUND LIMITED, and

12-CV-2239 (JSR)

SENATOR FUND SPC,

12-CV-2431 (JSR) 12-CV-3401 (JSR)

Defendants.

NOTICE OF MOTION OF ANDERSON KILL P.C.

TO WITHDRAW AS COUNSEL TO DEFENDANTS ALPHA PRIME FUND, LTD. AND SENATOR FUND SPC.

nydocs1-1020223.1

PLEASE TAKE NOTICE, that at a time and date to be determined by the Court, Anderson Kill P. C., will move before the Honorable Jed S. Rakoff, United States District Judge at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY to withdraw as counsel to Defendants Alpha Prime Fund, Ltd. and Senator Fund SpC (the "Motion").

PLEASE TAKE FURTHER NOTICE that, in support of the Motion,
Anderson Kill P.C. shall rely upon the accompanying Memorandum of Law, the
Declaration of Dennis J. Nolan in support of the Motion, and the proposed order
annexed hereto.

Dated: New York, New York October 2, 2013

Respectfully submitted,

ANDERSON KILL P.C.

By: Dennis J. Nolan
Dennis J. Nolan
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Beth D. Simon
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EXHIBIT A